

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Chapter 13
ROBIN LYNN BUSBY,	:	Case No. 20-10520-amc
	:	
Debtor.	:	
_____	:	

**NOTICE OF APPEARANCE AND  
DEMAND FOR SERVICE OF NOTICES AND PAPERS**

**PLEASE TAKE NOTICE** that the attorneys set forth below hereby appear on behalf of SMS Financial JDC, LP (“SMS”), and demand, pursuant to Rules 2002, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Sections 1109(b) and 342 of Title 11 of the United States Code, as amended, that all notices given in the above-captioned case and all papers served or required to be served in the above-captioned case be given to and served upon the undersigned attorneys, at the address set forth below:

<p>Ronald S. Gellert, Esq. Holly S. Miller Esq. Gellert Scali Busenkell &amp; Brown, LLC 8 Penn Center 1628 John F. Kennedy Blvd. Philadelphia, PA 19103 Phone: (215) 238-0012 Email: <a href="mailto:rgellert@gsbblaw.com">rgellert@gsbblaw.com</a> <a href="mailto:hsmiller@gsbblaw.com">hsmiller@gsbblaw.com</a></p>
---

**PLEASE TAKE FURTHER NOTICE** that the foregoing request includes not only notices and papers referred to in the Bankruptcy Code or Bankruptcy Rules, but also includes, without limitation, orders and notices of any applications, motions, orders, demands, hearings, requests or petitions, answering or reply papers, memoranda and briefs in support of any of the foregoing, and any other document brought before this Court with respect to the Bankruptcy Case,

whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, facsimile, telex, e-mail or otherwise.

**PLEASE TAKE FURTHER NOTICE** that neither this Notice of Appearance nor any subsequent appearance, pleading, claim or suit is intended or shall be deemed to waive SMS's (i) right to have final orders in non-core matters entered only after *de novo* review by a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which SMS, is or may be entitled under agreements, at law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

Dated: April 18, 2022

Respectfully Submitted,

GELLERT SCALI BUSENKELL & BROWN, LLC

/s/ Ronald S. Gellert

Ronald S. Gellert (PA ID #80783)

Holly S. Miller (PA ID # 203979)

8 Penn Center

1628 John F. Kennedy Blvd.

Philadelphia, PA 19103

Phone: (215) 238-0012

Email: rgellert@gsbblaw.com

hsmiller@gsbblaw.com

*Attorneys for Respondent, SMS Financial JDC, LP*